

IN RE: ROBYN P. ALBRECHT f/k/a	:	Chapter 13 Bankruptcy
ROBYN HANSON-SAXTON,	:	
	:	
Debtor	:	CASE NO. 5-19-03655
	:	
M&T BANK,	:	
	:	
Movant	:	11 U.S.C. §362 and 1301
	:	
vs.	:	
	:	
ROBYN P. ALBRECHT f/k/a	:	
ROBYN HANSON-SAXTON,	:	
DAVID L. ALBRECHT and	:	
CHARLES J. DEHART, III, ESQUIRE,	:	
	:	
Respondents	:	

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7. Denied for the reasons stated in paragraph 6.
8. Denied. Cause for relief from the automatic stay does not exist because:
 - a. Movant's interest in the property is adequately protected by virtue of the Plan, the equity cushion, and/or Debtor's offer of adequate protection payments.
 - b. The property is necessary for an effective reorganization.
 - c. Debtor is acting in good faith in an attempt to reorganize his mortgage debt.
9. Denied as but a legal conclusion without necessity of a response.
10. Denied as but a legal conclusion without necessity of a response.

WHEREFORE, Debtor respectfully requests that the Motion for Relief from Stay be denied and dismissed.

/s/Kevin M. Walsh
Kevin M. Walsh, Esquire
Attorney I.D. No. 35209
Attorney for Debtor/Respondent
297-299 Pierce Street
Kingston, PA 18704
(570) 283-3041

CERTIFICATE OF SERVICE

I, Kevin M. Walsh, Esquire, certify that a true and correct copy of the foregoing was forwarded to the below named on the 23rd day of March, 2020, as follows:

**Charles J. DeHart, III, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036**

- **By Clerk's Notice of Electronic Filing**

**James C. Warmbrodt, Esquire
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106**

- **By Clerk's Notice of Electronic Filing**

**Robyn Albrecht
115 Country Club Road
Dallas, PA 18612**

- **By U.S. First Class Mail, Postage Prepaid**

/s/Kevin M. Walsh

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